



U.S. Department of Justice

United States Attorney  
Southern District of New York

*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

March 29, 2023

**By ECF and Email**

The Honorable Ronnie Abrams  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: **United States v. Earl Ingarfield, 20 Cr. 146 (RA)**

Dear Judge Abrams:

The Government respectfully requests permission to file a two-page surreply in response to the defendant's reply in support of his request to compel purported *Brady* and *Giglio* materials, to address certain misstatements of fact made in the defendant's reply. In particular, the defendant incorrectly represents that individuals from the U.S. Attorney's Office for the Eastern District of New York ("USAO-EDNY") and the Federal Bureau of Investigation ("FBI") have attended all proffer sessions involving CW-1, including all proffer sessions conducted by this Office, erroneously suggesting that the USAO-EDNY and FBI participants are members of this prosecution team. As explained in the Government's prior submission, they are not. (*See* Dkt. 85). The Government's proposed surreply is attached hereto as Exhibit A.

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney

Application granted.

SO ORDERED.

A handwritten signature in blue ink, appearing to be "R. Abrams", written over a horizontal line.

Hon. Ronnie Abrams  
March 30, 2023

By:                     /s/                      
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cc: Richard Schonfeld, Esq.  
Steve Dichter, Esq.